

## **Exhibit G**

**Christine Marie Codner-Castellano**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
CHRISTINE MARIE  
CODNER-CASTELLANO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF ORANGE     )

CHRISTINE MARIE CODNER-CASTELLANO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 17 Merriewold Lane South, Monroe, New York 10950.

2. I am currently 49 years old, having been born on April 16, 1973.

3. I am the daughter of Robert Royce Codner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic melanoma on November 28, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father was an FDNY fireman. Every moment that he wasn't on the job, he spent home with my brother and me. He would bring us to the firehouse every Sunday, which was one of my first memories. Much of my volunteering now is based on what I learned from him—he loved to give back to the community. My dad was the first person to stop what he was

doing and run to help someone. My daughters and I lived with my parents for a short period of time. My father was tremendously helpful in raising my daughters. They were 8 years old and 5 years old at the time. They still have so many memories of him. Now, they're 17 and 15 years old. I see how my daughters love to give back to the community the way their grandfather did. We spent every birthday and holiday with my father. I was born in Queens, but my parents moved to Orange County when I was a kid. This area has a lot of FDNY firefighters.

6. My brother was a Port Authority Police Officer, and my dad was a retired FDNY firefighter at the time of 9/11/2001. When the World Trade Center attacks happened, they both jumped into action. We didn't see my father for quite some time. He spent a lot of time in the pile, in the rubble, looking for survivors. My father was very humble. He didn't want to talk a lot about what he did. It's different seeing it on TV than actually living it. My father would tell me about the air quality and the conditions, but he didn't want to tell me too many details, because he didn't want to scare me. I remember he told me how thick the smoke was. He described the heavy emotional atmosphere as well, with people crying and screaming for their lost loved ones around him. My father lost many firefighter friends that day. My brother also lost many of his friends that day. Seven or eight officers in his graduating class perished in the attacks.

7. Around 2006, my daughters and I lived in New Jersey, and we would go to visit our dad in Orange County on the weekends. My father would come out from the house and carry my daughters and all of our bags in. It started to "trickle down," first he couldn't come out to the car and carry my daughters in anymore. Then, he couldn't even muster the strength to come to the door. He loved his girls and wanted to see them as much as he could. We knew something was going on, but we weren't sure what it was. We took him to the doctor's office, where they ran several tests before discovering that he had melanoma. He had his salivary gland removed, and after that things were good for a while.

8. In 2012, everything came back. His melanoma returned, and it had spread to his internal organs. From there, it was a gradual decline. His breathing was labored, and he was really exhausted. He was always huffing and puffing, even when walking down the driveway to get the mail. He had Botox injections because he was sweating terribly after his salivary gland was removed. When the cancer re-emerged, my father went for chemotherapy treatments



several times per week.

9. It was certainly stressful, going back and forth from my home in New Jersey to the hospital in New York. I also was responsible for taking care of my two daughters, so I had to find someone to watch them while I was gone. It was a financial burden, too, to pay for gas, hotels, and meals when we were on the road bringing my father to treatments.

10. Toward the end, when my dad was in the hospital, he had to have a feeding tube put in. The cancer was blocking his esophagus. But a tumor in his stomach kept pushing the feeding tube out, so it didn't work. They were going to bring a new kind of chemotherapy for him, but, once the drugs arrived at the hospital, the nurses told us there was no point, as my father's prognosis was only a few days. Hearing that my father was only going to live for a few more days was devastating. The hospice nurses came in, and they gave me a book about the stages leading up to death. I remember thinking, "Wow, they should've given this to me weeks ago."

11. As far as my mother's life goes, I've become the role of my father. I do all her bills, her grocery shopping, and help her with her car and home. My dad was an intricate part of my family's life, even small things, like mowing the lawn or putting salt in the water softener. Any job that he had became my job. My mom was very emotional during the time of my father's illness. When my dad was in treatment at the hospital and she wasn't in the room, my father would whisper to me, "Make sure to sell the house." He was very protective of my mother and wanted to make sure she was well taken care of. He entrusted me with a lot of information. I knew that from her grief and her emotions, my mom wasn't capable of taking care of herself. I've also involved myself with the fire department as much as possible, through giving back and staying connected with our friends in the fire department.

12. When my dad died, I was going through a divorce. I was a single mom, and my dad was kind enough to pay for an attorney. My father gave us money for oil to heat the house in New Jersey, and he helped pay other bills, such as utilities and food costs so that my girls and I could continue to live there. Anything that needed to be taken care of in my home, my father was there to help. When my ex-husband took my car, my father went out and bought me a new car.

13. We miss my dad terribly. It's a huge loss in our lives—you don't realize how much someone brings to your life until they're gone. I'm glad I enjoyed the moments I did have with him, because he was really special.

*Christine Marie Codner-Castellano*  
CHRISTINE MARIE CODNER-CASTELLANO

Sworn to before me this  
*18<sup>th</sup>* day of July, 2022

*Darlene E. Decker*  
Notary Public

DARLENA E. DECKER  
Notary Public, State of New York  
Registration No. 01GE6237813  
Qualified in Orange County  
Commission Expires March 28, *2023*

**Victoria M. Codner**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF**  
**VICTORIA M. CODNER**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF ORANGE     )

VICTORIA M. CODNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 44 High Street, Apt. 512, Chester, New York 10908.

2. I am currently 74 years old, having been born on April 3, 1948.

3. I am the wife of Robert Royce Codner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic melanoma on November 28, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Robert and I were married for 43 years. We had a wonderful relationship. We were very involved in each other's lives. We were a close family, always doing activities together and taking trips. We took a family cruise to Alaska, and we had planned to travel a lot more together. We camped together with our children. He was a wonderful husband, father, and grandfather. My children and my grandchildren miss him terribly. He was a family man and a



good provider.

6. Robert was an FDNY fireman. He was very private about his experiences at the World Trade Center on and after 9/11/2001. He didn't want me to know a lot, because he was a protector. I remember taking his uniform to and from the dry cleaners for funerals for a whole year. We lost a lot of friends in the attacks on the World Trade Center. Robert was probably working for months down at the pile. He was there all the time. It was devastating. My son was a Port Authority Detective, and he lost most of his friends too. I was worried about him also. How was he going to get through this? It was a difficult time for our family. We're a very close family, so we all worry about each other.

7. Robert had melanoma on his face once in 2006, which was treated with surgery. He was in surgery at the VA Hospital for twelve hours to remove the melanoma. They took out his salivary glands, and the lymph nodes on his neck. He had to have Botox injections to control his chewing and swallowing after the surgery. But otherwise, he was fine. After that, Robert went for PET scans, and everything kept coming back okay. One day, a few years later, he was coming up the stairs and he said, "I can't breathe at all." I took him to the cardiologist, who saw him right away. The doctor saw that he had blood clots in his lungs and admitted him to the hospital. An oncologist came in and ran more tests, and that's how we found out Robert had malignant melanoma.

8. The last few months, he was losing weight extremely quickly. He was anemic. We had to go back and forth to the hospital for him to receive IVs of iron and blood, which strengthened him a little bit. The weight loss was severe; we had nutritionists and nurses come to the home to try to help him. But it wasn't working, as the cancer was taking over his body. Robert was a strong, 6'1 man, a good-looking guy, but when he was ill, I couldn't even recognize him anymore.

9. I spent a month and a half in the hospital with him, day and night. I slept on the couch next to him. I knew what was going to happen—that Robert was going to die. He was still coherent at that time. The oncologist came in and asked us to consider a feeding tube, and he said yes. But the cancer was pushing out the feeding tube, and it didn't work. So, that was the end of the story.

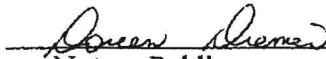
10. Robert was my children's hero. He was always there for them. They did everything together. I tried not to cry much in front of my children because I wanted to protect them. I wanted my children to know that I was there for them. We made it through. But to this day, my children and my grandchildren miss him terribly. Robert used to make an English muffin for my granddaughter's breakfast every single day. Now, she can't even look at an English muffin without crying. I went to a grief group for about a year, but it became too much. I just have to keep going, especially as a mother.

11. It was also hard to take care of the bills. Of course, I had to take care of things at home, pay my bills, do all this paperwork that I had no idea how to do. Robert used to take care of everything, so taking care of the paperwork was a lesson I learned the hard way. The Fire Department took away all the benefits Robert and I had enjoyed. I lost his pension, the health insurance, everything. Money was tight. I had to make sure our house was in good condition to sell. It was tough times. They took everything away from me. I'm not 100% healthy, but what do you do without health insurance? Dental insurance? Vision insurance? It has been very difficult since.

12. My life will never be the same. I lost my best friend. Especially the way the world is right now, I feel lost. Robert used to explain everything to me and tell me what to do. Now, I don't know what the future holds. I don't know if I'm going to have enough money to get through. I worry about that, and I worry about my children and grandchildren. Robert would've known what to do. We would have been together.

  
VICTORIA M. CODNER

Sworn to before me this  
18 day of July, 2022

  
Notary Public

DOREEN DIEMER  
Notary Public, State of New York  
No. 01D13073350  
Qualified in Orange County  
Commission Expires April 22, 20 26



**Joseph Thomas Fitzpatrick**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF**  
**JOSEPH THOMAS FITZPATRICK**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF FLORIDA            )  
                                      : SS.:  
COUNTY OF CLAY            )

JOSEPH THOMAS FITZPATRICK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 4356 Eagle Landing Parkway, Orange Park, Florida 32065.

2. I am currently 44 years old, having been born on February 24, 1978.

3. I am the son of Joseph Francis Fitzpatrick Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic lung cancer on March 12, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father was the only parent I had. When I was a kid, my dad would take me into the city to visit his job at the Transportation Department. He would take me to school and take me fishing. He was my best friend and everything I could ask for in a father. He attended all of my football games and school events. Every time I fell, he was there to pick me back up. He was my mentor. He was a stand-up parent who taught me right from wrong and showed me

how to fix my mistakes.

6. After I graduated high school, I decided to go into the Navy, following my father's path. I'm now a combat disabled veteran—I served six tours in Iraq and Afghanistan as a Naval officer. 9/11 is close to my heart, and it's very painful for me to re-live these memories. When I was injured, my dad drove me to every one of my medical appointments. He was there for all of my diagnoses and treatments. He was there for six years of my medical rehabilitation and ten years of my PTSD rehabilitation. My dad attended all my kids' events until he was physically unable to do so anymore. Everything I am today is because of him.

7. My father operated heavy machinery for the NYC Department of Transportation. On and after 9/11/2001, he helped clear the debris and remove bodies from the World Trade Center pile. He was part of a small group from Track Operations that mobilized over 50 pieces of heavy equipment from the Brooklyn Pier to Ground Zero in less than five hours, for which he was commended by the Department of Transportation. He worked at Ground Zero for almost the entirety of the clean-up, which was until May 2002.

8. When my father was diagnosed with lung cancer in the first week of January 2017, it was already Stage IV. I remember receiving the call from my sister Edith that our father was diagnosed with cancer. I came up to New Jersey for the next appointment, where they told us that his cancer had metastasized overnight. They said his lung cancer was aggressive and that his only option was chemotherapy. He had one chemotherapy treatment, but the cancer spread so rapidly through his body and to his brain. They never offered a surgery or any other treatment options. It was already too far along.

9. His appetite diminished so rapidly that he could no longer eat. Most days, he couldn't get out of bed. He quickly lost weight and strength, and he became extremely depressed. We bathed him, wiped him, and tried to feed him. I had never seen a soldier like my father turn into an old, weak man in a matter of days. Between the second and fourth week of January 2017, these changes had already started to take place. I remember him telling me, "I can't get up from the couch." And then he urinated on himself. It was a very hard and sad sight to see.

10. He wasn't an angry person, but when he was sick, he would anger so easily and become extremely aggressive. He was angry because he was losing control over his body. His mental condition deteriorated as well. He had very deep and scary nightmares, cold sweats, and

disorientation. Multiple times, we caught him trying to climb out the bedroom window, screaming, “The room is on fire!” There were many days where he would ask me, “Joe, do you smell those dead bodies?” Toward the end, he didn’t know where he was and even lost the ability to speak.

11. The emotional impact of my father’s death on my life was immense. I’m still a train wreck today because I’m the one who found my father when he died. It’s bad enough suffering from PTSD and trauma from overseas but knowing that I couldn’t have done anything to prevent my father from dying hurts just as badly. I found him at 4:00 a.m. with blood coming down his face, because he was trying to pull the breathing tube out to gasp for air. Even years later, I feel like his death was just a nightmare. I kiss his urn every morning and night before I go to bed. I can’t even look at any of his pictures. His death put me in a deep state of depression, and I had to go back to therapy. I don’t know how to cope with my dad’s death or move past it.

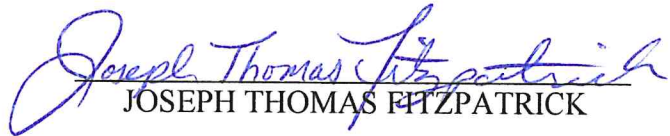
12. My father’s passing also had a severe financial impact on the lives of my family and me. Because of my combat-related medical conditions, I can’t work. My dad helped me raise my four children, and he even supported my wife when she lost her job. My dad was a significant player in my children’s lives. He spent six months out of the year down in Florida with me taking care of my kids. My dad supported us financially for the past 15 years. We fell on some hard times, and my dad made sure my mortgage was paid, lights stayed on, and food was on the table. He’d take my kids to the mall or the movies just to keep them happy. After his death, it has been hard to financially recover, as my wife and I are still unable to work.

13. My children are also forever changed since their grandfather’s death. They are emotionally distant. They miss their grandfather immensely. My youngest child—who was only two and a half at the time of my father’s death—still asks for him. That’s the kind of impact my father had on people’s lives. Since his death, he has missed my daughter getting a basketball scholarship and going to college. He also missed my son getting married and having a child of his own.


14. When my father died, we lost an American hero. My dad was truly my heart. He was the glue that held our family together. He was the sole parent for my sisters and me. My father uprooted his life to care for me and my four children. He not only saved me twice from



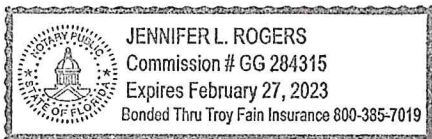
suicide attempts, but he also saved me from drug and alcohol addiction. His death turned my children's lives upside down. It's hard for them to not have their only grandparent around. I watched my father wither away within a matter of two months. It was hopeless—we could do nothing about it except pray. He was so strong, selfless, and a devoted father and grandfather. He risked his life to breathe in those toxins to save thousands of lives without blinking an eye. This hero was my lifeline: my only parent, my only friend. Since his passing, my family has changed. I cannot find words to describe my feelings of what losing him actually meant to us. This was a blink-of-an-eye devastation.

  
JOSEPH THOMAS FITZPATRICK

Sworn to before me this  
12<sup>th</sup> day of July, 2022



Notary Public



**Edith Marie Plaia**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
EDITH MARIE PLAIA**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF OCEAN        )

EDITH MARIE PLAIA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 308 Lake Crystal Brook Drive, Little Egg Harbor, New Jersey 08087.

2. I am currently 54 years old, having been born on April 12, 1968.

3. I am the daughter of Joseph Francis Fitzpatrick Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic lung cancer on March 12, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I would talk every day. We would do lots of activities together, like barbecues and family parties. He was my wingman. He was always there for me when I was growing up. My parents divorced when I was fourteen years old, and my dad was a strict parent—to a point. My dad would always get me out of trouble. When I got pregnant at eighteen, my dad was the only one who was there for me. I was married at twenty-one, and he

walked me down the aisle. My father was extremely close with my son, because my son's biological father was not in his life. My father helped me raise my son, until I got married, and continued to help me after I was married.

6. My father worked as a foreman for the Department of Transportation. He was part of the clean-up crew at Ground Zero, starting on 9/11/2001. He operated heavy machinery to clear debris from the pile. His job was to lift up debris from the buildings and search for victims and bodies underneath. He was one of the few people who knew how to operate the machinery over the rough terrain of the debris. My dad was a Marine who served in Vietnam. He had tears in his eyes when he told my siblings and me that this was even worse than Vietnam. He was mentally, emotionally, and physically wrecked by the 9/11-cleanup experience. My father worked on the World Trade Center "pile" until about 90% of the debris was removed, approximately May 2002. Some nights, he worked so late that he wouldn't even come home.

7. My father believed in eating right and doing right for his body. He was a healthy person. But his health was never the same after 2001. He would go to the doctor yearly for World Trade Center Health Program checkups. A few months after 9/11, the doctors told him he had asthma. Then, he had bronchitis. He would have pneumonia three times a year, which wasn't normal. After one visit in January 2017, where he received an X-Ray, the doctors told me he needed a biopsy. The biopsy revealed that he had metastatic lung cancer.

8. My dad didn't really want to do chemotherapy, but he gave it a try. The chemotherapy really took a toll on him. But it didn't work. His cancer metastasized to his brain and body. They put him on oxygen right away and sent him home. He passed away in March 2017—that's how fast his illness progressed. I stayed by my dad's bedside every night at home and in the hospital, trying to make him eat and keeping up his spirits. I had to put him on hospice, which was really hard. The nurses had to give him morphine, which hurt to see. We even had to bathe him because he couldn't bathe himself anymore.

9. It's hard to put the emotional impact my dad's illness and death had on my life into words. When my dad was diagnosed with cancer and I learned that it was Stage IV, I called my brother Joseph right away. I told him, "I can't do this alone, I need you here." I wasn't able to cope emotionally, but I tried to show my father that I wasn't sad. I was always a leader in my

family, because after my parents divorced, I had to take care of my younger brother and sister. But I couldn't stay as strong for them when our dad got sick. I felt so empty.

10. My father's illness had a great impact on my life financially. I took a lot of time off work, and I had to ultimately quit my job. I wasn't granted any unemployment benefits because I quit. Fortunately, my husband was able to support me financially during that time. But I would have done anything for my dad.

12. They say you feel the most grief the first six months, maybe a year, after someone's death. But it's been five years since my father's death, and it's still so hard. There's not a day that goes by that I don't think of my father, kiss the urn with his ashes in it, and wear the ashes in a locket on my chest. The pain is so real. I can't talk about him without crying. It's like I don't even believe he's gone.

  
EDITH MARIE PLAIA

Sworn to before me this  
17 day of July, 2022



Notary Public



**JoAnn Rios**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
JOANN RIOS**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA       )  
                                  : SS.:  
COUNTY OF FLAGLER    )

JOANN RIOS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 47 Palm Drive, Bunnell, Florida 32110.
2. I am currently 49 years old, having been born on June 25, 1973.
3. I am the daughter of Joseph Francis Fitzpatrick Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from metastatic lung cancer on March 12, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My father and I had a great relationship. I was the baby of the family. My father and I lived near each other and would spend a lot of time together. We would go to lunch, the racetrack, and shopping at Walmart. He taught me how to fix cars, and he always had a special seat on his motorcycle for me. I suffered from migraines, and my dad always gave me suggestions on how to treat them. He guided me through everyday life. He was the Superman in



my life, and he was my best friend, my rock. I was a young mother, and he always gave me advice on how to raise my children. He always knew just what to say when I had a hard time with my kids. My dad knew about everything I went through; he was my confidante.

6. Before my dad got sick, I lived with him after my husband and I fell out. I didn't know how to be independent, because my husband had always taken care of me. I didn't know how to support three children, and I had bad credit. My dad helped me get back on my feet. I have three daughters; my oldest daughter Missy, was the light of my father's life. She's 29 now. They had a very close-knit relationship. He would even help Missy out with her own child. As much as he was there for me, he was there for his grandchildren and great-grandchildren. He worked hard his whole life. He divorced my mom when I was ten, so he was a sole parent. His children were his life. He led by example. He told us, "Make memories, and be there."

7. My dad was a Marine who served in Vietnam. In 2001, he was working for the Department of Transportation when he responded to the attacks on the World Trade Center. He had tears in his eyes when he told my siblings and me that the World Trade Center clean-up was even worse than Vietnam. He was mentally, emotionally, and physically wrecked by his experience at Ground Zero. Pulling the body parts out of the ground and moving the debris was terrible for him. But he went, and he did it selflessly. My dad didn't think twice to respond to the World Trade Center. He hid a lot of his pain and emotion. We never saw him cry. He loved life and wanted to have a good attitude towards life.

8. I remember when he started to get sick. He was raking leaves in the yard and started to get dizzy. He didn't know why. He had to crawl to the front door. He started to become forgetful. For example, he would forget to turn the stove off. It was little things like that that we noticed. Soon, he would start to grab his chest and tell us he had chest pain. He had a cough, too, which he could never seem to get rid of. He felt like he was okay, but soon his driver's license was taken away from him. Everything went downhill from there.

9. I was out of town when I learned of my dad's cancer diagnosis. My youngest daughter was graduating from the Air Force. My sister called me and told me that our father was diagnosed with Stage IV lung cancer. That was in January 2017, and eight weeks later he died. Eight weeks seemed like the blink of an eye. I was in school to be a beautician, and I dropped out when my dad got sick because he needed me. My siblings and I took turns staying with him so

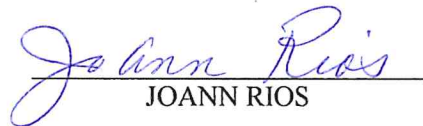


he could have around-the-clock care.

10. My dad didn't really want to do chemotherapy, but he gave it a try. The cancer was so rampant in his body that the best chemotherapy could do would be to prolong his life by a little. The chemotherapy really took a toll on his body. It wasn't agreeing with him—it just wasn't working for him. He started to have severe nosebleeds, his vitals were terrible, and everything was just deteriorating. He never even made it to the second treatment, because the doctors wanted to put him into hospice.

11. He wasn't an emotional person, but one day he was slumped over in the kitchen from exhaustion. My sister Edith didn't want us to show any emotion because she wanted to stay strong for him. But I burst into tears. I said, "I'm sorry dad, I didn't want to cry." He said, "It's okay to cry, hon. I wish I could cry too, because I'm angry." His struggle with his illness really impacted me emotionally. When I watched the strongest person I know turn into a helpless sick man, I just felt so emotionally destroyed. There was nothing I could do to save him. It was so hard to watch him struggle to breathe. I wish I could have given him more of my time, even though I was by his side every day.

12. I have nine grandchildren, and he missed out on almost all of them. He misses out every day with my daughters. Two of them are married, and the third is going to be married soon. I wish he could be there for her wedding. There's nothing worse than missing somebody you can't see ever again. We can't go out to lunch again or talk on the phone. I wish I could hear his voice. My father meant a lot of things to a lot of people.

  
JOANN RIOS

Sworn to before me this  
\_\_\_\_\_ day of July, 2022

\_\_\_\_\_  
Notary Public

## ALL-PURPOSE ACKNOWLEDGMENT

State of Florida

County of Flagler

The foregoing instrument was sworn to (or affirmed), subscribed, and acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 12 day of July, 2022 (year), by Joann Rios (name of person making statement), who is personally known to me or has produced Florida (type of identification) as identification. Drivers License



Shamika Coleman  
Notary Public, State of Florida  
My Comm. Expires 10/20/2024  
Commission No. HH 55085

Place Notary Seal or Stamp Here

WITNESS my hand and official seal.

[Signature]  
SIGNATURE OF NOTARY  
Shamika Coleman

ATTENTION NOTARY: Although the information requested below is OPTIONAL, it may prove valuable to persons relying on this Acknowledgment and could prevent fraudulent reattachment of this certificate to another document.

### DESCRIPTION OF ATTACHED DOCUMENT

Affidavit of Joann Rios  
TITLE OR TYPE OF DOCUMENT

3  
NUMBER OF PAGES

NO Date  
DATE OF DOCUMENT

No other signers  
SIGNER(S) OTHER THAN NAMED ABOVE

THIS CERTIFICATE  
MUST BE ATTACHED  
TO THE DOCUMENT  
DESCRIBED AT RIGHT

**John Vincent Goggin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF**  
**JOHN VINCENT GOGGIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NASSAU     )

JOHN VINCENT GOGGIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 312 Clinton Street, Bellmore, New York 11710.

2. I am currently 22 years old, having been born on January 12, 2000.

3. I am the son of John Edward Goggin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on May 6, 2008, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was really young when my father became ill, and I was only eight years old at the time my father passed. I'm the youngest in my family. I was mostly around my mom as a kid, as my dad was very busy with his job in the NYPD. I unfortunately don't have many memories with my dad. It's hard for me, because I don't know what to say when people ask me about memories with my dad. I remember that he took my siblings and me upstate once, and



that's when I learned how to swim. I also remember visiting the precinct that he worked at. I'm thankful for those memories.

6. After 9/11, I barely even saw my dad. I was very young at the time, still running around in diapers. What I know about 9/11 is based on what other people have told me. My dad was working day and night on the World Trade Center clean-up. My mom told me that he put in 1200 hours of overtime. My dad was the provider for the family, and he did what he needed to do to pay the bills.

7. When my dad was diagnosed with cancer, my mom had to explain it to me in a way that a kid could understand. She told me at the bus stop, when I got off the bus from school. My older brother and sister were there too, and my sister was crying. I didn't understand that my father was dying. At eight years old, it's really hard to comprehend that you won't see your father again. So, it was a different experience for me than it was for the rest of my family, who took it really hard. My oldest brother Mike took it the worst, because he and my father were best friends. I remember the funeral and the wake, with bagpipes playing. So many people came to his funeral. My dad was a sociable person, he had many friends and built a strong community around him. It was also a really difficult time for my mom. I remember my father's friends would come to the house to check in on her.

8. I was just shell-shocked. None of my friends have ever had to go through anything like this. The illness, the death, and the experience of growing up without a father. In middle school and high school, I played little league baseball, and I was the only one without a father to go to my baseball games. I didn't have a father to play catch with. I felt different from the other kids. It's also hard to explain to people what happened to my dad. Not everyone's father dies from illnesses related to a terrorist attack. It makes me feel like an outlier.

9. Emotionally, it was pretty hard for me. I had no one to look up to, so my brother had to stand in as my father figure. I became really close to my brother and my mom. They both raised me. I had to start going to therapy, because the death of a parent is a pretty traumatic experience. As I entered my teen years and started to realize what happened, it began to really affect me. I would get weird looks from people when I explained that my father died from a cancer related to 9/11. It was awkward and hard to explain. I was proud of my dad and his sacrifice, but I was embarrassed by the judgment of those who would wonder why I didn't have

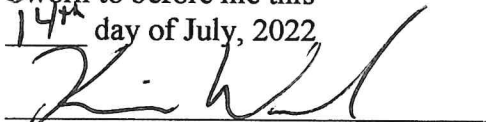
a father.

10. My dad's illness and passing affected me dramatically, especially witnessing what my mom went through after his death. We struggled financially after my dad died, and my mom was always stressed about making the next mortgage payment and keeping the lights on. I've always been grateful to have a roof over my head and food on the table. But there were times when I was nervous about my family and me ending up homeless. There were very difficult times.

11. I want to follow in my father's footsteps. In high school, I decided that I wanted to become a police officer after attending 9/11 memorials. I couldn't see myself doing anything else. I applied to John Jay College of Criminal Justice my senior year of high school, and I just got my criminal justice degree with a 3.5 GPA. I'm in the process of becoming a Suffolk County Police Officer. I passed my physical last month and went through orientation, and I'm waiting for my polygraph, medical, and psychological exams. This is definitely one of the biggest accomplishments in my life—my mother always says she's proud of me. If I didn't know all about my father's service in the NYPD, and all the great things he did over his 20-year career, I would've never considered becoming a police officer. I'm doing this in honor of my father.

  
JOHN VINCENT GOGGIN

Sworn to before me this  
14<sup>th</sup> day of July, 2022

  
Notary Public

KEVIN WARD  
NOTARY PUBLIC - STATE OF NEW YORK  
NO. 01WA6420758  
QUALIFIED IN NASSAU COUNTY  
COMMISSION EXPIRES 08/16/2025



**Karen A. Goggin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
KAREN A. GOGGIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF NASSAU     )

KAREN A. GOGGIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 312 Clinton Street, Bellmore, New York 11710.

2. I am currently 64 years old, having been born on June 12, 1958.

3. I am the wife of John Edward Goggin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from pancreatic cancer on May 6, 2008, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. John and I met when we were seventeen years old. We did everything together. We married young and had our son Michael a year later. Mike was a hyperactive kid, he had ADHD. John was a good father, and we worked hard to raise him. We signed our son up for sports: football, baseball, everything. We had another child ten years later, and another child about ten years after that. John was a Detective for the NYPD. We were very involved with the

Police Department. We became friends with other police officers' families. We would go to the NYPD's Christmas parties every year. John was the provider, and I was a stay-at-home mom. John paid all the bills and did everything around the house. I didn't expect to be a widow at 49 years old with an eight-year-old son.

6. I was home on 9/11/2001. My youngest son was still in diapers. John called me and yelled, "Put the TV on!" I saw the second plane hitting the World Trade Center and thinking, this can't be happening. After that, we didn't see him for months. He was at Ground Zero cleaning up for months. It all happened so fast.

7. He didn't want to tell us anything about his cancer at first. He just thought that it was a hernia, and he was keeping it to himself. But I could tell something was wrong. His skin color was off, and he was losing weight. His condition deteriorated within a matter of weeks. One day, he had horrible pain in his stomach, so he went to the hospital. He was at NYU Langone for hernia surgery, which is where they did a biopsy that found that he actually had a malignant tumor. In April 2008, John was diagnosed with Stage IV pancreatic cancer. The doctors said he might barely have a few weeks to live. He told the doctors, "I have an eight-year-old son. How am I going to tell him that he has no father?"

8. It shocked the whole family. He was unfortunately given a death sentence. The doctors said there was absolutely nothing they could do for him. John had in-house hospice. It wasn't long at all. It happened very fast. He started throwing up a lot and became very stiff and weak. He was deteriorating every day. You think, with cancer, you'd have some time. But we didn't realize how far gone he was. He couldn't even speak toward the end. To try and make John feel better, I told him, "I'll take care of the kids, don't worry." He died shortly after that.

9. I was totally in shock at first. I didn't want to do anything, but I had to go on for my children. My poor kids were eating cereal. I wondered to myself, "How are we going to survive? Where are we going to live?" Initially after John died, the NYPD took away his pension and our health benefits. I also didn't work much, my husband did everything for me. I didn't have any skills. It was extremely hard, and I was so young—only 49. I felt like people used to stare at me. I would've never expected to be a widow at that age.

10. The Police Department helped me after John's death. His friends would come and sit with me after John died. I had a lot of support from our police officer community. Even

today, they still send me flowers every Mother's Day.

11. John's death had a huge impact on my life and our family's life financially. I wasn't working or getting a salary at the time. We had mortgage payments on our house, and I wasn't sure how I was going to pay for them. I qualified for John's pension, but I didn't get it until three years after his death. So, that was a big help. But those first three years were rough. I moved out to Long Island and worked while my youngest son was in school. We had a lot to deal with: landscapers, taking care of the pool, taking care of the house. That all fell apart. I was scammed once by contractors. They took advantage of me because I was a widow. Sometimes, I couldn't pay for the oil for heating in the winter. I somehow managed to put food on the table for my children. It was really hard, but we made it. I always thought, my poor kids don't deserve this.

12. We really struggled after John's death. I couldn't even pay for communion. It was hard emotionally and financially. Especially emotionally—I was filled with anger and hatred at the time. And I don't hate anybody. So many people died from this act of terrorism. I would think, "Who caused this, why did this happen? Did someone pay for this to happen?" I try to let it go, because I'm a forgiving type of person. But I often think about it. My kids have no father, my daughter has no father to walk her down the aisle. My son has no father to see him graduate from college. Now, my youngest son is going to take after his father and become a police officer. We miss John every day.

  
KAREN A. GOGGIN

Sworn to before me this

12 day of July, 2022

  
Notary Public

MICHAEL FRANCIS SEIP  
NOTARY PUBLIC - STATE OF NEW YORK  
No. 01SE6423336  
Qualified in Nassau County  
Commission Expires 10/12/2025